

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BROADCAST MUSIC, INC., et al.
Plaintiff,

v.

SEVEN ARCH, INC., d/b/a BRAVE NEW WORLD
AND ROBERT BYNUM, individually,
Defendants.

CIVIL ACTION

NO. 02-3829

**MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to the Federal Rules of Civil Procedure ("F.R.C.P"), Rule 6(b), Defendants Seven Arch, Inc., d/b/a Brave New World and Robert Bynum ("Seven Arch, Inc."), through undersigned counsel, hereby move this Court to enlarge the time in which they are required to answer, plead, or otherwise respond to Plaintiffs' Complaint in the above-captioned matter, and in support thereof aver as follows:

1. On or about June 18, 2002, Plaintiffs instituted this action against Defendants alleging *inter alia* copyright infringement.
2. Upon information and belief, Plaintiffs served Defendants with a copy of the Complaint on or about July 19, 2002, which Defendants, because the principal of the Defendant Corporation had not received a copy of the Complaint, did not review until on or about August 28, 2002.
3. Further, Defendants did not secure legal counsel until August 29, 2002.

4. Defendants' actions in not responding to Plaintiffs' Complaint was not intentional or willful, but was due to inadvertence.

5. On or about August 29, 2002, new counsel for Defendants, Lance D. Lewis, Esquire, discussed with Plaintiffs' counsel, Stanley H. Cohen, Esquire, the present Motion for an Enlargement of Time to Respond to the Complaint. Plaintiffs' counsel has agreed that Plaintiffs will not contest the present motion.

6. Accordingly, Defendants request an enlargement of time, up to and including September 13, 2002, to respond to Plaintiffs' Complaint.

Respectfully submitted,

Dated: September 3, 2002

Lance D. Lewis
Law Offices of Lance David Lewis, Esquire
101 N. Easton Road, Suite 202
Glenside, PA 19038
(215) 572-1981
Attorney for Defendants,
Seven Arch, Inc. d/b/a
Brave New World and
Robert Bynum, Individually

CERTIFICATE OF UNCONTESTED MOTION

I, Lance D. Lewis, hereby certify that I have discussed the foregoing Motion for Enlargement of Time to Respond to Plaintiff's Complaint with Plaintiffs' counsel, Stanley H. Cohen, Esquire 1635 Market Street, Seven Penn Center, 12th Floor, Philadelphia, PA 19103, who has stated that Plaintiffs do not contest the foregoing Motion.

Dated: September 3, 2001

Lance D. Lewis
Law Offices of Lance David Lewis, Esquire
101 N. Easton Road, Suite 202
Glenside, PA 19038
(215) 572-1981
Attorney for Defendants,
Seven Arch, Inc. d/b/a
Brave New World and
Robert Bynum, Individually

CERTIFICATE OF SERVICE

I, Lance D. Lewis, hereby certify that I have caused to be served a true and correct copy of the foregoing Motion for Enlargement of Time to Respond to Plaintiff's Complaint upon the following counsel:

FIRST CLASS MAIL

Stanley H. Cohen, Esquire
1635 Market Street
Seven Penn Center, 12th Floor
Philadelphia, PA 19103

Dated: September 3, 2001

Lance D. Lewis
Law Offices of Lance David Lewis, Esquire
101 N. Easton Road, Suite 202
Glenside, PA 19038
(215) 572-1981
Attorney for Defendants,
Seven Arch, Inc. d/b/a
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ORDER

AND NOW, this _____ day of September, 2002, upon consideration of Defendants' Motion for Enlargement of Time to Respond to Plaintiffs' Complaint, it is hereby ORDERED and DECREED that the Motion is hereby GRANTED.

Defendants shall have up to and including September 13, 2002 to answer, plead, or otherwise respond to Plaintiff's Complaint.

SO ORDERED,
BY THE COURT

J.